

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
No.: 5:15-CV-0066-GCM

MARSHALL LEE BROWN, JR., )  
                                )  
                                )  
                                Plaintiff, )  
                                )  
                                )  
v.                               )      **JOINT MOTION FOR ENTRY OF**  
                                )      **CONSENT DECREE**  
GEORGE T. SOLOMON, *et. al.*, )  
                                )  
                                )  
                                Defendants. )

Plaintiff Marshall Lee Brown, Jr. and Defendants George T. Solomon, Betty Brown, Swindell Edwards, Daniel Redding, Susan White and Kenneth Beaver (collectively, the “Parties”) hereby provide notice of their settlement of this matter following extensive settlement negotiations. The Parties have prepared a proposed Consent Decree, which is being submitted contemporaneously herewith, that sets forth the terms of the Parties’ settlement.

WHEREFORE, the Parties jointly move the Court for entry of their proposed Consent Decree.

Respectfully submitted, this the 2nd day of March, 2020.

**POYNER SPRUILL LLP**

By: /s/ John M. Durnovich Andrew H. Erteschik  
N.C. State Bar No. 35269  
John M. Durnovich  
N.C. State Bar No. 47715  
Nathaniel C. Zinkow  
N.C. State Bar No. 53778  
301 South College Street, Suite 2900  
Charlotte, NC 28202  
Telephone: 704.342.5344  
Facsimile: 704.342.5264  
aerteschik@poynerspruill.com  
jdurnovich@poynerspruill.com  
nzinkow@poynerspruill.com

*Counsel for Plaintiff Marshall Lee  
Brown, Jr.*

**JOSHUA H. STEIN  
Attorney General**

By: /s/ Norlan Graves Norlan Graves  
Assistant Attorney General  
N.C. State Bar No. 39709  
N.C. Department of Justice  
Public Safety Section  
P.O. Box 629  
Raleigh, NC 27602-0629  
Tel: 919-716-6535  
Facsimile: 919-716-6761  
ngraves@ncdoj.gov

*Counsel for Defendants Solomon,  
Brown, Edwards, Redding, White, and  
Beaver*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, through which a notice of the filing will be sent to:

Norlan Graves  
Assistant Attorney General  
N.C. Department of Justice  
Public Safety Section  
P.O. Box 629  
Raleigh, NC 27602-0629  
[ngraves@ncdoj.gov](mailto:ngraves@ncdoj.gov)  
*Counsel for Defendants Solomon, Brown,  
Edwards, Redding, White, and Beaver*

This the 2nd day of March, 2020.

**POYNER SPRUILL LLP**

By: /s/ John M. Durnovich  
John M. Durnovich  
N.C. State Bar No. 47715  
301 South College Street, Suite 2900  
Charlotte, NC 28202  
Telephone: 704.342.5344  
Facsimile: 704.342.5264  
[jdurnovich@poynerspruill.com](mailto:jdurnovich@poynerspruill.com)  
*Counsel for Plaintiff Marshall Lee Brown, Jr.*